

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

DAILY NEWS, LP; CHICAGO TRIBUNE  
COMPANY, LLC; ORLANDO SENTINEL  
COMMUNICATIONS COMPANY, LLC; SUN-  
SENTINEL COMPANY, LLC; SAN JOSE  
MERCURY-NEWS, LLC; DP MEDIA  
NETWORK, LLC; ORB PUBLISHING, LLC;  
AND NORTHWEST PUBLICATIONS, LLC,

Plaintiffs,

v.

MICROSOFT CORPORATION, OPENAI, INC.,  
OPENAI LP, OPENAI GP, LLC, OPENAI, LLC,  
OPENAI OPCO, LLC, OPENAI GLOBAL, LLC,  
OAI CORPORATION, LLC, and OPENAI  
HOLDINGS, LLC,

Defendants.

Case No. 1:24-cv-03285-SHS-OTW

**NOTICE OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE**

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, I, Elana Nightingale Dawson, hereby move this Court for an Order for admission to practice *pro hac vice* to appear as counsel for Defendants OpenAI, Inc., OpenAI L.P., OpenAI GP, L.L.C., OpenAI, L.L.C., OpenAI OpCo, LLC, OpenAI Global, LLC, OAI Corporation, LLC., OpenAI Holdings, LLC (together, “OpenAI”).

I am a member in good standing of the Bar of the State of Illinois and the District of Columbia, and certificates of good standing are attached hereto as **Exhibit A**. There are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached the declaration pursuant to Local Rule 1.3.

*[Signature on following page]*

Dated: June 6, 2024  
Washington, D.C.

Respectfully Submitted,

**LATHAM & WATKINS LLP**

/s/ Elana Nightingale Dawson

Elana Nightingale Dawson

555 Eleventh Street, NW

Suite 1000

Washington, D.C. 20004

Telephone: (202) 637-2200

Facsimile: (202) 637-2201

Email: [elana.nightingaledawson@lw.com](mailto:elana.nightingaledawson@lw.com)

*Attorneys for OpenAI*